



## MANITOWOC PUBLIC UTILITIES

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January 18, 2011

Mr. James G. Crawford, P.E.  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue  
Green Bay, WI 54313-6727

Subject: 2010 Annual Power Plant Compliance Certification Report

Dear Mr. Crawford:

Permit condition I.K.(5)(2) of Manitowoc Public Utilities' operation permit #: 436035930-P10 requires us to submit an **annual certification of compliance** covering the period of January 1, 2010 to December 31, 2010. This report is to be submitted within 60 days after the end of the monitoring period. We are also required to submit the report to:

Compliance Data – Wisconsin  
Air and Radiation Division  
USEPA  
77 West Jackson  
Chicago, Illinois 60604

The following significant events occurred during this monitoring period:

- Total Particulate Emission Compliance Tests performed on Manitowoc Public Utilities Boiler No. 8 (B28) on January 12, 2010 and on Boiler No. 9 (B09) on January 13, 2010. Stack testing observed by Mr. Jason Treutel, Air Management Specialist, for the Wisconsin Department of Natural Resources. B28 test results were in compliance with the applicable permit limitation of Permit No.: 436035930-P10 condition I.E.1.a.(1). B09 test results were in compliance with the applicable permit limitation of Permit No.: 02-RV-147 condition I.A.1.b.(1).
- Boiler MACT: On February 24, 2010 MPU filed a request for an extension of the deadline for submittal of a complete Part II MACT Hammer application. The extension requested pursuant to 40 C.F.R. § 63.1, 63.9, NR 460.08 and an email dated February 1, 2010 from John Melby of the WDNR. The request supplemented and incorporated by reference previous filings of MPU concerning the MACT Hammer application process.

- EPA Acid Rain Program annual reconciliation report for compliance year 2009 received March 3, 2010 with sufficient allowances available for compliance.
- EPA CAIR NOx annual reconciliation report for compliance year 2009 received March 3, 2010 with sufficient allowances available for compliance.
- B9 CAIR NOx Allocation: Filed requests with the WDNR for B9 CAIR NOx Annual and ozone season allocations in compliance with the May 1, 2010 filing deadline.
- Received U.S. Environmental Protection Agency's (EPA'S) request dated December 24, 2009 for owner/operators of all coal and oil-fired electric utility steam generating units to provide information from each unit under Section 114 of the Clean Air Act (CAA). Received second EPA Section 114 request dated February 8, 2010 that clarified that mercury is to be included in the request and that units 6, 7 and 8 were removed from the request.
- Filed Part I and Part II of the EPA Section 114 Information Collection Request on March 29, 2010 in compliance with the April 1, 2010 deadline.
- Quality Assurance Test Protocol (QATP) for B09 ICR stack testing prepared and submitted to the WDNR on April 21, 2010.
- Stack testing notice filed with WDNR and the EPA on April 26, 2010 for the ICR emission testing scheduled for boiler B09. The ICR stack testing completed on May 21<sup>st</sup>, 2010. The stack testing was observed by Mr. Jason Treutel and Mr. Ben McFarland, Air Management Specialists, for the Wisconsin Department of Natural Resources.
- The (SO2) and (NOx) continuous emission monitors installed in stack S20 (Part 75 system) converted to dual range operation to accommodate current operations.
- Issued stack test waiver request for boilers B26 and B27 with the WDNR for biennial sulfur dioxide and particulate matter compliance tests on July 2, 2010. The waiver request approved by the WDNR on August 6, 2010 to no later than September 19, 2012.
- Boiler MACT: Tom Palionis of the WDNR in an email dated August 27, 2010, extended the deadline for submittal of a complete Part II MACT Hammer application until March 15, 2011. The extension issued pursuant to 40 C.F.R. § 63.19(a)(12), 63.9(i) and NR 460.08 (9) (a-c).
- Filed Part III of the EPA Section 114 Information Collection Request on August 30, 2010 in compliance with the August 31, 2010 deadline. Additional addendum materials uploaded on September 28, 2010 along with email correspondence to clarify the submittal.
- The Part 75 and Part 60 Relative Accuracy Test Audit (RATA) performed on the SO2/NOx/CO2/Flow CEM system installed in the breaching of boiler B09 September 13-14,


2010. Mechanical Systems Inc. assisted by Interpoll Laboratories performed the RATA testing.

- The Part 75 Relative Accuracy Test Audit (RATA) performed on the SO<sub>2</sub>/NO<sub>x</sub>/CO<sub>2</sub>/Flow CEM system installed in the S20 Stack on September 15-16, 2010. Mechanical Systems Inc. assisted by Interpoll Laboratories performed the RATA testing.
- The Part 60 Relative Accuracy Test Audit (RATA) performed on the SO<sub>2</sub>/NO<sub>x</sub>/CO<sub>2</sub> Continuous Emission Monitoring (CEM) System installed on boiler B28 on September 15, 2010. Mechanical Systems Inc. assisted by Interpoll Laboratories performed the RATA testing.
- Received U.S. Environmental Protection Agency (EPA region V) request on November 18, 2010 to provide boiler information under Section 114 of the Clean Air Act (CAA). MPU met with the agency on December 20, 2010 and this submittal stayed pending negotiations.
- CAIR NO<sub>x</sub> Ozone Season Program annual reconciliation report for compliance year 2010 received December 16, 2010 with sufficient allowances available for compliance.
- Boilers B25 and B27 were not operated during this monitoring period.
- Boiler B26 operated one day during this monitoring period.

Please find enclosed MPU's 2010-compliance certification report. We believe this report contains all the information you need to evaluate MPU's compliance status. However, if you need additional information or have any questions about this report or its contents, please don't hesitate to contact Mr. Jerry Ahlswede of my staff at (920) 686-4211.

I hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in the attached report are true, accurate and complete.

Sincerely,



Nilaksh Kothari, P.E.  
General Manager

cc. US EPA - (Chicago, Ill) w/attachments  
Red Jones - (MPU) w/attachments  
Jerry Ahlswede - (MPU) w/attachments  
Tom Reed - (MPU) w/attachments

Don Duenkel - (MPU) w/attachments  
Power Plant Files - (MPU) w/attachments

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**Manitowoc Public Utilities  
Power Plant**

**701 Columbus Street  
Manitowoc, Wisconsin**

Annual

Compliance Certification Report

DNR Permit No.:436035930-P10

DNR Permit No.:02-RV-147

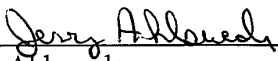
DNR Permit No.:08-JJW-178

For the Period

January 1, 2010 - December 31, 2010

Prepared January 18, 2011

Approved by:

  
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Jerry Ahlswede  
Energy Supply and Production Supervisor

Date: 1-18-2011

Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
The following B05 limitations are per DNR Permit No.:02-RV-147, [Supersedes DNR Permit No.:436035930-P10]				
I.B.1.a. – B05 PM < 0.80 lb/hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.1.c.(1) – B05 Test PM method 5&202	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.1.c.(2) – B05 Stack physical records	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Drawings are in files	No Stack changes
I.B.2.a. – B05 PM <sub>10</sub> < 0.80 lb/hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.2.c.(1) – B05 Test PM method 5&202	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.3.a. – B05 SO <sub>2</sub> < 0.10 lb/hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.3.c.(1) – B05 Test SO <sub>2</sub> method 6,6A,6C	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.4.a. – B05 NO <sub>x</sub> < 10.0 lb/hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.4.c.(1) – B05 Test NO <sub>x</sub> method 7	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.4.c.(2) – B05 Maintain burner records	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Operating manual onsite	No burner changes
I.B.4.c.(3) – B05 Notify DNR on solid fuel	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	DNR notified feeders were blanked off.	Solid Fuel feeders and the FD fan removed.
I.B.4.c.(4) – B05 Maintain gas records	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Gas records on file.	No operation of this unit during 2010
I.B.4.c.(5) – B05 File quarterly gas data	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Included in the DNR quarterly reports	First quarter: 4/21/10 Second quarter: 7/16/10 Third quarter: 10/12/10 Fourth quarter: 1/12/11
I.B.5.a. – B05 CO < 8.40 lb/hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.5.c.(1) – B05 Test CO method 10	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.6.a. – B05 VOC < 0.60 lb/hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.6.c.(1) – B05 Test VOC method 25A,18	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	No Stack Test Required this Period
I.B.7.a. – B05 VE ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	COM is in service

Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.B.7.c.(1) – B05 Test VE method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	COM is in service
<b>The following limitations are per DNR Permit No.:436035930-P10</b>				
I.B.1.a.(1) – P28 PM < 0.15 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring and calculations	
I.B.1.c.(1) – P28 Test PM with Method 5	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.B.2.a.(1) – P28 VE ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	COM	No exceedance recorded during unit operation.
I.B.2.a.(2) – P28 Compliant gas : oil ratio	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Intermittent	Operating methodology	Requirement is not applicable as opacity limits are all 20%
I.B.2.b.(1) – P28 Measure VE with B05 off	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Requirement is not applicable as opacity limits are all 20%	COM is in service
I.B.2.c.(1) – P28 Test VE method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	COM is in service
I.B.2.c.(3) – P28 Maintain fuel records	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Daily fuel records are maintained on file	
I.B.3.a.(1) – P28 NO <sub>x</sub> ; Heat input ≤ 4814 mmBtu/month	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Monitoring & Record Keeping	Maximum of 262 mmBtu/month (rolling average) during 2010
I.B.3.a.(2) – P28 Fire gas and oil only	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Monitoring & Record Keeping	
I.B.3.a.(3)(a) – P28 NO <sub>x</sub> < 8.5 gr/Hp on oil	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring and calculations	
I.B.3.a.(3)(b) – P28 NO <sub>x</sub> < 6.0 gr/Hp on dual	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring and calculations	
I.B.3.c.(1) – P28 Test NO <sub>x</sub> method 7	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.B.3.c.(3)(d) – P28 Report heat input	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Included in the DNR quarterly report	First quarter: 4/21/10 Second quarter: 7/16/10 Third quarter: 10/12/10 Fourth quarter: 1/12/11
I.B.4.a.(1) – P28 Sulfur < 0.5% by wt.	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Fuel Sampling and Analysis	Last delivery was on 10/20/05, 0.246% sulfur
I.B.4.c.(1) – P28 Test SO <sub>2</sub> method 6,6A,6B,6C,or 8	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.B.4.c.(2) – P28 Document sulfur content	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Fuel records are on file.	No oil purchases during 2010.

Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.C.1.a.(1) – B26 PM < 0.6 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Method 5 & 202 Stack Test	Stack Test completed on September 18, 2008 1b PM/mmBtu = 0.017
I.C.1.a.(1) – B27 PM < 0.6 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	
I.C.1.c.(2) – B26 Baghouse Dp 0.2-10.0"	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record data every operating shift	Dp range during this period was 1.30 - 5.44
I.C.1.c.(2) – B27 Baghouse Dp 0.2-10.0"	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	
I.C.1.c.(4)(c) – B26 Supplemental fuel ≤ 30%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record data daily	B26 daily Max. of 0 %
I.C.1.c.(4)(c) – B27 Supplemental fuel ≤ 30%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	
I.C.1.a.(3) – B26 Fire gas in warm up burner	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	
I.C.2.a.(1) – B26 SO <sub>2</sub> < 3.2 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Method 6C Stack Test	Stack Test completed on September 18, 2008
I.C.2.a.(1) – B27 SO <sub>2</sub> < 3.2 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	
I.C.2.c.(2) – B26 Sulfur content per ASTM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Vendor fuel reports	
I.C.2.c.(2) – B27 Sulfur content per ASTM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	
I.C.2.c.(3)(d) – B26 SO <sub>2</sub> < 3.2 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Daily calculation of fuel supply	Max. daily calculated lbs.SO <sub>2</sub> /mmBtu = 1.35
I.C.2.a.(3)(d) – B27 SO <sub>2</sub> < 3.2 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No operation of this unit during 2010	
I.C.2.b.(1) – B26, B27 Operate Part 75 SO <sub>2</sub> CEM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product and EPA quarterly reports	First quarter: 4/22/10 Second quarter: 7/16/10 Third quarter: 10/14/10 Fourth quarter: 1/12/11
I.C.2.b.(2) – B26, B27 Follow CEM QA/QC plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	
I.C.3.a.(1) – B26, B27 VE ≤ 40%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	COM	No excess opacity
I.C.3.a.(1) – B26, B27 Test VE with Method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	COM is in service
I.C.3.a.(2) – B26 Gas start up of boiler	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Monitoring & Record Keeping	
I.C.4.a.(1) – B26, B27 Operate optimized boiler	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring and calculations	No stack test required and B27 was not operated this Year



Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.C.4.c.(1) – B26, B27 Test NOx method 7,7A,7B,7C,7D, or 7E	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Year	B27 was not operated this Year
I.C.4.c.(3) – B26, B27 Maintain training records	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	B27 was not operated this Year
I.C.5.a.(1) – B26, B27 Operate Part 75 CO <sub>2</sub> CEM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product and EPA quarterly reports	First quarter: 4/22/10 Second quarter: 7/16/10 Third quarter: 10/14/10 Fourth quarter: 1/12/11
I.C.5.b.(2) – B26, B27 Follow CEM QA/QC plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	
I.C.6.a.(1) – B26, B27 Operate Part 75 Flow CEM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product and EPA quarterly reports	First quarter: 4/22/10 Second quarter: 7/16/10 Third quarter: 10/14/10 Fourth quarter: 1/12/11
I.C.6.b.(2) – B26, B27 Follow CEM QA/QC plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	
I.E.1.a.(1) – B 28 PM < 0.03 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Method 5 & 202 Stack Test	Stack Test completed on January 19, 2010 0.020 lb/mmBtu
I.E.1.a.(1) – B 28 Baghouse Dp 0.2-10.0"	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record data every operating shift	Dp range during 2010 was 0.68 to 5.86"
I.E.1.a.(2) – B28 MPU boiler ash ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring and calculations	Process is not in service & was not used in 2010
I.E.1.a.(2) – B28 Alternate fuel ≤ 30%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record data daily	Daily Max. of 28.4 %
I.E.1.a.(3) – B28 Fire Natural gas in burner	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	
I.E.2.a.(1) – B28 SO <sub>2</sub> < 0.89 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	CEM	Max. 30-day average # SO <sub>2</sub> /mmBtu = 0.501
I.E.2.a.(1) – B28 SO <sub>2</sub> removal > 90%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	CEM	Min. 30-day average removal 90.0 %
I.E.2.b.(2) – B28 Operate Part 60 SO <sub>2</sub> CEM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product and DNR quarterly reports	First quarter: 4/21/10 Second quarter: 7/16/10 Third quarter: 10/12/10 Fourth quarter: 1/12/11
I.E.2.b.(9) – B28 Follow CEM QA/QC plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	
I.E.2.c.(1) – B28 Test SO <sub>2</sub> with method 6,6A,6B,6C, or 8	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.E.3.a.(1) – B28 VE ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Intermittent	COM	6 minutes of excess opacity during 2010
I.E.3.c.(1) – B28 Test VE with method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	COM is in service



Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.E.4.a.(1) – B28 NO <sub>x</sub> < 0.55 lb/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	CEM	Max. 30-day average # NO <sub>x</sub> /mmBtu = 0.116
I.E.4.a.(2) – B28 NO <sub>x</sub> < 0.20 lb/mmBtu during the ozone season	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	CEM	Max. 30-day average # NO <sub>x</sub> /mmBtu = 0.116 during ozone season
I.E.4.a.(3) – B28 NO <sub>x</sub> std. exempt at startup, shutdown, malfunction	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	
I.E.4.b.(1) – B28 Operate Part 60 NO <sub>x</sub> CEM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product and DNR quarterly reports	First quarter: 4/21/10 Second quarter: 7/16/10 Third quarter: 10/12/10 Fourth quarter: 1/12/11
I.E.4.b.(1) – B28 Operate Part 75 NO <sub>x</sub> CEM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product and EPA quarterly reports	First quarter: 4/22/10 Second quarter: 7/16/10 Third quarter: 10/14/10 Fourth quarter: 1/12/11
I.E.4.b.(4) – B28 Follow CEM QA/QC plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	
I.E.4.c.(1) – B28 Test NO <sub>x</sub> with method 7,7A,7B,7C,7D, or 7E	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.E.5.a.(1) – B28 CO < 0.74 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Combustion techniques	Stack Test completed on June 10, 2003 0.027 lb/mmBtu
I.E.5.c.(1) – B28 Test CO with method 10,10A, or 10B	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.E.6.a.(1) – B28 VOC < 0.16 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Combustion techniques	
I.E.6.c.(1) – B28 Test VOC with method 18,25,25A, or 25B	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.E.7.a.(1) – B28 Be < 0.00004 #/mmBtu	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring and calculations	Max. daily calculated lbs.Be/mmBtu = 0.000000971
I.E.7.c.(1) – B28 Test Be with method 29	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	Stack Test completed on June 10, 2003 <0.000000633 lb/mmBtu
I.E.7.c.(2) – B28 Fuel Be content	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Supplier fuel analysis data	Pet coke = <1.0 µg/g Coal = <1.0 µg/g
I.E.8.a.(1) – B28 Hg < 1µgm/m <sup>3</sup> (ambient)	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Assumed	Parametric monitoring and calculations	
I.E.8.c.(1) – B28 Test Hg method 29	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Assumed	No Stack Test Required this Period	Stack Test completed on June 10, 2003 <0.000000579 lb/mmBtu
I.E.8.c.(1) – B28 Fuel Hg content	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Supplier fuel analysis data	Pet coke = <1.0 µg/g Coal = 0.11 µg/g

Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.E.9.a.(1) – B28 Operate Part 75 CO <sub>2</sub> CEM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product and EPA quarterly reports	First quarter: 4/22/10 Second quarter: 7/16/10 Third quarter: 10/14/10 Fourth quarter: 1/12/11
I.E.9.b.(2) – B28 Follow CEM QA/QC plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	
I.E.10.a.(1) – B28 Operate Part 75 Flow CEM	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product and EPA quarterly reports	First quarter: 4/22/10 Second quarter: 7/16/10 Third quarter: 10/14/10 Fourth quarter: 1/12/11
I.E.10.b.(2) – B28 Follow CEM QA/QC plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Work product	
I.F.1.a.(1) – P 31 PM < 1.5 lbs per hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring	
I.F.1.c.(1) – P 31 Test PM Method 5	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.F.1.c.(2) – P 31 Baghouse Dp 0.2-10.0"	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record data every operating shift	Dp range during 2010 was 3.12 to 3.33
I.F.1.a.(2)(a) – S31 S31 > 42 feet High	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	
I.F.1.a.(2)(b) – S31 S31 < 1.17 foot Diameter	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	
I.F.1.a.(2)(c) – S31 No Rainhat on Stack S31	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	
I.F.2.a.(1) – P31 VE ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring	
I.F.2.c.(1) – P31 Test VE with method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.G.1.a.(1) – P32 PM < 1.5 lbs per hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring	
I.G.1.c.(1) – P32 Test PM Method 5	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.G.1.c.(2) – P32 Baghouse Dp 0.2-10.0"	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record data every operating shift	Dp range during 2010 was 1.54 to 9.93"
I.G.1.a.(2)(a) – P32 S32 > 30 feet High	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	
I.G.1.a.(2)(b) – P32 S32 < 1.0 foot Diameter	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	
I.G.1.a.(2)(c) – P32 No Rainhat on Stack S32	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	

Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.G.2.a.(1) – P32 VE ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring	
I.G.2.c.(1) – P32 Test VE with method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.H.1.a.(1) – P11 PM precautions	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Operating methodology & Record Keeping	
I.H.2.a.(1) – P11 VE ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.H.2.c.(1) – P11 Test VE with method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.I.1.a.(1) – P12 Fugitive dust precautions	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Operating methodology & Record Keeping	
I.I.2.a.(1) – P12 VE ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.I.2.c.(1) – P12 Test VE with method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	No Stack Test Required this Period	
I.J.1.a.(1) – P 13 PM < 2.28 lbs per hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring	Recycle system in operation, no limitation
I.J.1.a.(2) – P13 Maintain stack parameters	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	Recycle system in operation, no limitation
I.J.2.a.(1) – P13 VE ≤ 20%	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring	Recycle system in operation, no limitation
I.K.1.a.(1)(a) – Facility As < 2.08 lbs/month [state limit]	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Calculations & Record Keeping	
I.K.1.a.(1)(b) – Facility Cd < 2.08 lbs/month [state limit]	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Calculations & Record Keeping	Max. of 0.40 lbs/month
I.K.1.a.(1)(c) – Facility Ni < 20.8 lbs/month [state limit]	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Calculations & Record Keeping	
I.K.2.a.(1) – Facility Biennial Testing	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Monitoring & Record Keeping	
I.K.3.a.(1) – Facility Malfunc. prevention plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.K.4.a.(1) – Facility Solid Fuel Sampling and Reporting	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Fuel sampling & analysis & Record Keeping	
I.K.5.a.(1) – Facility Submit Semi-Annual Monitoring Reports	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	First half: 08/20/2010 Second half: 01/17/2011

Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.K.5.a.(2) – Facility Annual Certification report	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	This document complies with this requirement
I.K.6.a.(1) – Facility Submit Quarterly Excess Emission Reports	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Not required as the excess emissions <1% and downtime <5%.
I.K.6.a.(2) – Facility Submit Summary Quarterly Excess Emission Reports	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping and DNR quarterly reports	First quarter: 4/21/10 Second quarter: 7/16/10 Third quarter: 10/12/10 Fourth quarter: 1/12/11
I.K.7.a.(1)(a) – Facility Stack Test at 100% Capacity	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.K.7.a.(1)(b) – Facility Provide DNR 20-day Test Notification and Submit Test Protocol	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.K.7.a.(1)(c) – Facility Test with DNR Approved USEPA Methods	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.K.7.a.(1)(d) – Facility Provide DNR Two Copies of Test Report (60-days)	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
Acid Rain Compliance	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Monitoring & Record Keeping	EPA report received on March 3, 2010
The following limitations are per DNR Permit No.:08-JJW-178				
I.C.1.a.(1) – Process P12 PM < 3.42 lb/hour	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Method 5 & 202 Stack Test	Stack Test completed on July 9, 2009 0.15 lb/hour
I.C.1.b.(1&2) –P12 Control with baghouse Operate baghouse	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Baghouse is electrically interlocked with process
I.C.1.b.(3&4) –P12 Maintain Dp device Baghouse Dp 0.2-10.0”	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record data every operating shift	Dp range during 2010 was 1.48 to 8.12”
I.C.1.b.(5) –P12 Maintain the stack parameters	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Physical installation	Drawings supplied to WDNR with stack test protocol.
I.C.1.c.(1) –P12 Test PM method 5,5A,5B,5D,5E,5F,5G,5H or 17 including 202	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Stack Test completed on July 9, 2009
I.C.2.a.(1) – Process P12 VE < 20 %	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring	Stack Test completed on July 9, 2009 5% max.
I.C.2.a.(2) – Process P12 VE < 10 % [coal dust]	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Parametric monitoring	Stack Test completed on July 9, 2009 5% max.
I.C.2.c.(1) – Process P12 Test VE with method 9	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Stack Test completed on July 9, 2009	

Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.ZZZ.1.a.(1) – Facility HAPs < Table A	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.ZZZ.2.a.(1) – Facility Prepare MPAP	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.ZZZ.2.a.(2) – Facility Operate and Maintain Air Pollution Control Equip.	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.ZZZ.2.a.(3) – Facility Evaluate HAP Impact for New or Increased PE	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.ZZZ.3.a.(1) – Facility Request Stack Test Extension if Required	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Extension will not be required
I.ZZZ.3.a.(2) – Facility Perform Stack Test Operating at Capacity	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Stack Test completed on July 9, 2009
I.ZZZ.3.a.(3) – Facility Notify DNR 20-days Before Stack Testing	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	WDNR notified 06/01/2009
I.ZZZ.4.a.(1) – Facility Submit Periodic Monitoring Reports	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping and DNR quarterly reports	First quarter: 4/21/10 Second quarter: 7/16/10 Third quarter: 10/12/10 Fourth quarter: 1/12/11
I.ZZZ.4.a.(2) – Facility Submit Periodic Compliance Certification	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	2009 Certification report filed with WDNR 6/19/10 and this report satisfies 2010 period.
I.ZZZ.4.a.(3) – Facility Submit Quarterly Excess Emission Reports	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping and DNR quarterly reports	First quarter: 4/21/10 Second quarter: 7/16/10 Third quarter: 10/12/10 Fourth quarter: 1/12/11
I.ZZZ.5.a.(1) – Process P12 Comply with CAM Plan	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.ZZZ.6.a.(1)(a) – P12 Notify DNR of Start of Construction	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	WDNR notified 12/17/08
I.ZZZ.6.a.(1)(b) – P12 Notify DNR of Anticipated Initial Startup	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	WDNR notified 02/25/2009
I.ZZZ.6.a.(1)(c) – P12 Notify DNR of Actual Initial Startup	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	WDNR notified 04/13/2009
I.ZZZ.6.a.(1)(a) – P12 Notify DNR of Start of Construction	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	WDNR notified 12/17/08
I.ZZZ.6.a.(2) – P12 Construction Authorization Expiration	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Authorization expires 18 months after issuance or April 18, 2010

Permit Term	Compliance Status	Continuous or Intermittent	Compliance Determination Method	Other Information
I.ZZZ.6.a.(3) – P12 Modified Emission Unit P12	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.ZZZ.6.a.(4)(a) – S32 Modify Stack S32 Prior to Operating P12	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	WDNR notified 03/19/2009
I.ZZZ.6.a.(4)(b) – S13 Cease use of S13 bypass	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Bypass was never constructed
I.ZZZ.6.a.(5) – P12 Update MPAP for P12	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	
I.ZZZ.6.a.(6)(a) – P12 Request Extension for Stack Testing if Needed	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Extension will not be required
I.ZZZ.6.a.(6)(b) – P12 Stack Testing to be Performed at Capacity	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	Stack Test completed on July 9, 2009
I.ZZZ.6.a.(6)(a) – P12 Notify DNR 30-days Prior to Stack Testing	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	WDNR notified 06/01/2009
I.ZZZ.6.a.(7) – Facility Submit Periodic Monitoring Reports and Compliance Certification	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	First quarter: 4/21/10 Second quarter: 7/16/10 Third quarter: 10/12/10 Fourth quarter: 1/12/11 Certification report filed with WDNR 6/19/10
I.ZZZ.6.a.(8) – P12 Update Permit Application of Any Changes	<input checked="" type="checkbox"/> In compliance <input type="checkbox"/> Out of compliance	Continuous	Record Keeping	